

SHER TREMONTE LLP

October 31, 2018

**BY ECF**

The Honorable Loretta A. Preska  
United States District Judge  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

**Re: *United States v. Person, et al.*, No. 17 Cr. 683 (LAP)**

Dear Judge Preska:

We represent Chuck Person in the above-referenced case and write to request a modification of the conditions of Mr. Person's pretrial release.

On October 10, 2017, the Honorable Katherine H. Parker set conditions of Mr. Person's release that restricted Mr. Person's travel to the Middle District of Alabama, where he resides, and the Southern and Eastern Districts of New York (as well as all points in between for the purpose of traveling to meet with counsel or to attend court proceedings). (ECF No. 9.) By Order dated November 16, 2017, the Court expanded the scope of Mr. Person's permitted travel to include the Northern and Southern Districts of Alabama. (ECF No. 20.) By Order dated July 25, 2018, the Court expanded the scope of Mr. Person's travel to include the Northern District of Georgia, where Mr. Person and his fiancée now reside. (ECF No. 83.)

We respectfully request that the Court modify the conditions of Mr. Person's release so that he is permitted to travel generally to Jeffersonville, Indiana (in the Southern District of Indiana) and Louisville, Kentucky (in the Western District of Kentucky). Mr. Person's future in-laws reside in Louisville and Jeffersonville, which are adjacent cities across the Ohio River, and Mr. Person anticipates the need to travel to visit them regularly – particularly during the upcoming holiday season. For instance, if permitted by the Court, Mr. Person and his fiancée expect to travel to Louisville and Jeffersonville from November 17 through 20 to celebrate Thanksgiving with his fiancée's family. Pretrial Services and the U.S. Attorney's Office have no objection to this request.

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Mr. Person will remain obligated to comply with the other conditions of his release, including pretrial supervision as directed by Pretrial Services.

We appreciate the Court's consideration.

Respectfully submitted,

*/s/ Michael W. Gibaldi*

Michael W. Gibaldi

cc: Counsel of record (by ECF)